

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and
to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

R.06-04-009

**OPENING COMMENTS OF THE
ALLIANCE FOR RETAIL ENERGY MARKETS
ON THE PROPOSED DECISION OF
PRESIDENT PEEVEY AND ALJ GOTTSTEIN**

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Date: January 2, 2007

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In accordance with Article 14 of the Commission's Rules of Practice and Procedure, the Alliance for Retail Energy Markets ("AReM") respectfully submits the following comments on the Proposed Decision ("PD") of President Michael R. Peevey and Administrative Law Judge ("ALJ") Meg Gottstein issued on December 13, 2006.¹

I. INTRODUCTION

AReM generally supports the PD, which provides a thorough and reasoned analysis of the issues concerning the design and implementation of an interim greenhouse gas ("GHG") emissions performance standard ("EPS") for new long-term financial commitments to baseload generation undertaken by load serving entities ("LSEs"), as authorized by Senate Bill ("SB") 1368. As a practical matter, AReM's electric service provider ("ESP") members are likely to enter into very few, if any, new long-term commitments during the next few years that would be deemed "covered procurement" under SB 1368 and the PD. AReM is therefore less concerned

¹ AReM is a California mutual benefit corporation whose members are electric service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of particular members or affiliates of its members with respect to the issues addressed herein.

about the design details of the interim EPS and is more concerned that the process for ESPs to demonstrate compliance with the standard not be unduly complex or burdensome. AReM is thus very encouraged that, consistent with AReM's recommendation, the PD adopts a straightforward "after-the-fact" compliance Attestation Letter process for ESPs.² While the Attestation Letter process adopted in the PD differs slightly from that which AReM had originally proposed, the differences are relatively minor and generally acceptable to AReM. However, AReM believes that certain elements of the proposed Attestation Letter filing, review and approval process are unnecessary or otherwise problematic.

For example, AReM believes it is neither necessary nor appropriate to allow for protests of Attestation Letter filings, particularly given that the Energy Division will review each Attestation Letter to verify that the reporting entity has complied with the applicable reporting and documentation requirements. AReM is also concerned that (a) the review and approval process for Attestation Letter filings outlined in the PD lacks finality and will frustrate the efforts of ESPs to enter into long-term financial commitments for new generation resources that may be needed to meet resource adequacy requirements ("RAR") and Renewables Portfolio Standard ("RPS") targets; and (b) the PD's provisions concerning non-compliance penalties are overly broad, and could result in LSEs being subject to large monetary penalties for even the most minor or innocent infraction of the EPS rules.

AReM's concerns about the proposed Attestation Letter process and non-compliance penalties, including AReM's recommendations for modifying the PD to address those concerns, are discussed in more detail below.

² Under the PD, the same Attestation Letter process would apply to community choice aggregators, and small utilities.

II. COMMENTS

A. **The PD Should Be Revised to Provide More Finality With Regard to Approval of Compliance Attestation Letters.**

With respect to the compliance process for ESPs adopted in the PD, AReM is concerned by the language in the PD providing that an Attestation Letter submitted by an ESP (or an Advice Letter, in the case where an ESP, at its discretion, seeks pre-approval of a “covered procurement”) will be reviewed under the Commission’s procedures governing advice letter filings, which include opportunity for protests and responses, but that no Attestation Letter shall be “deemed approved” under those procedures.³ In this regard, the PD provides further:

The Energy Division shall review the advice letters and approve them if the attestation is in compliance with today’s adopted interim EPS rules. Energy Division approval of the advice letter only means that the attestation is in compliance with these rules, and does not establish any other matters (e.g., it does not determine that particular plants are in actual compliance with the EPS or that financial commitments not fully disclosed in the attestation are in compliance with this decision). Electric service providers, community choice aggregators and small electrical corporations shall be subject to penalties if the attestation letters are found, at a later date, to be incomplete, misleading or incorrect.⁴

1. Attestation Letters Should Not Be Subject to Protest.

Based on its reading of D.05-01-032 and the advice letter rules adopted therein, AReM understands the PD to provide that, unlike certain advice letter filings that are “deemed approved” at the end of the initial 30-day review period if there are no protests of the advice letter, Attestation Letters must be approved by the Energy Division. AReM questions the need to allow for protests of Attestation Letters, however, given that the Energy Division should have all the information it needs to determine whether an Attestation Letter is in compliance with the EPS rules and whether any covered procurement reported in the filing is in compliance with the

³ See PD, p. 133 and Conclusion of Law No. 41.

⁴ PD, p. 133.

EPS. Indeed, the Attestation Letters are more akin to the compliance filings required for RAR and the RPS program than the traditional advice letter filings for which the Commission's rules for advice letters filings were designed, and as such they should not be subject to protests. In addition, there are two other problems with the compliance review process outlined in the PD that should be addressed.

2. The Commission Should Direct Staff to Approve or Otherwise Act with Respect to Attestation Letters Within 30 Days of Submission.

Another problem with the compliance process adopted in the PD is that there is no time limit set for the Energy Division to act on an Attestation Letter filing. If no Attestation Letter is to be “deemed approved” after the initial protest period, and there is no time limit for staff to act on the filing, an ESP could find itself in a kind of regulatory limbo. That might not be of concern to an ESP that did not engage in any “covered procurement” during the reporting year. For an ESP that did enter into a contract or contracts that may be subject to the EPS, however, the lack of timely approval of its Attestation Letter could cause their contractual arrangements to be terminated or give rise to other complications. It is thus imperative that the Energy Division act on all Attestation Letters, and particularly those in which “covered procurement” is being reported, in a timely manner. AReM therefore recommends that the Commission direct the Energy Division to complete its review and inform the reporting entities within 30 days whether their filing has been approved or if further information or action is required before approval can be granted. To that end, AReM proposes that the first sentence of the third paragraph in Ordering Paragraph 4 should be revised as follows:

Energy Division shall review the Attestation Letters and **within 30 days of submission either approve the filing** if the attestation is in compliance with the Interim EPS Rules **or inform the filer if further information or action is required to obtain approval.**

3. Approval of an Attestation Letter Should Clearly Be Understood to Mean That Any Covered Procurement Reported in the Attestation Letter Has Been Determined to Be In Compliance with the EPS.

A third problem with the compliance process outlined in the PD is that it fails to provide any real certainty for an ESP concerning its compliance status even after its Attestation Letter has been approved. Assuming an ESP has provided all required documentation, the Energy Division should be able to make a definitive determination as to whether any covered procurement reported by the entity is in compliance with the EPS (i.e., whether the contract, and the underlying resource, in fact passed through the ESP “gateway” as has been attested). Otherwise, the Energy Division’s approval of the Attestation Letter will serve little if any purpose. Of course, the approval would not apply to any covered procurement that was not reported. And the ESP would be subject to penalties if its Attestation Letter is later found to be incomplete, misleading or incorrect. There thus appears to be no valid reason for staff to not affirm that a covered procurement meets the EPS. Indeed, that is what AReM understood to be the whole idea behind the “gateway” approach. Accordingly, AReM recommends that the text of the PD quoted above and the corresponding language in Ordering Paragraph 4 be revised as follows:

The Energy Division shall review the advice letters and approve them if the attestation is in compliance with today’s adopted interim EPS rules **and any covered procurement reported in the attestation is in compliance with the EPS.** Energy Division approval of the advice letter ~~only~~ means that the attestation is in compliance with these rules, and ~~does not establish any other matters (e.g., it does not determine that particular plants are in actual compliance with the EPS or that financial commitments not fully disclosed in the attestation are in compliance with this decision)~~ **that any covered procurement reported in the advice letters is in compliance with the interim EPS (i.e., the covered procurement passed through the gateway as attested by the reporting entity).** Electric service providers, community choice aggregators and small electrical corporations shall be subject to penalties if the attestation letters are found, at a later date, to be incomplete, misleading or incorrect.

B. The PD Should Be Revised to Clarify That Multiple Short-Term Contracts Only Need to be Reported If The Combined Terms of the Contracts Add Up to Five Years or More in Duration and the Contracts Are for Baseload Resources.

The PD provides that all LSEs are required to disclose in their compliance submittals “any multiple contracts of less than five years with the same supplier, resource or facility.”⁵ The PD explains this requirement “is necessary to ensure that LSEs do not circumvent the EPS rule by entering into a series of contracts with terms of less than five years with the same supplier, resource or facility.” The PD goes on to explain, “Such multiple contracts should be considered a single commitment and be reviewed as such (e.g., a contract for a three-year term link to a contract for the following three years must be seen as a single commitment of six years).”

AReM does not disagree with the PD’s basic reasoning in this regard, nor does it necessarily object to the requirement to disclose multiple short-term contracts with the same supplier, resource or facility. It would be overkill, however, to require LSEs to report every such contract, particularly as the number of such contracts could literally run into the hundreds or even thousands for a larger LSE. Accordingly, AReM recommends that the requirement to report short-term contracts be limited to related contracts that have a combined term of five years or longer.⁶

For example, an LSE that had two short-term contracts with the same supplier, one with a term of one year and the other four years, the LSE would be required to disclose the contracts. However, an LSE that had two short-term contracts for the same resource, one contract with a term of one year and the second two years, the LSE would not be required to report the contracts. Additionally, the reporting requirement should only apply to short-term contracts for the same

⁵ PD, p. 142 and Finding of Fact 162.

⁶ Also, AReM has reviewed and endorses Constellation’s recommendation to clarify in the PD that the rules regarding multiple short-term contracts will not be applied ex post facto basis.

resource or facility and only to contracts for baseload generation. Thus, for example, an LSE that had multiple short-term contracts for the same non-baseload resource would not be required to report the contracts in its EPS compliance filing.

Specifically, to make the short-term contract reporting requirement adopted in the PD more consistent with the intent of SB 1368, AReM recommends that Ordering Paragraph 11 of the PD be revised as follows:

11. In addition to other documentation required by this decision, all LSEs shall disclose the following information:

- A. Any multiple contracts **for baseload resources** of less than five years with the same supplier, resource or facility, **where the combined terms of the contracts is five years or more in duration**; and
- B. Investments in retained generation, including combined-cycle gas turbine (CCGT) powerplants deemed to be in compliance under § 8341(d)(1). This information shall describe the investment amount and type of alteration by generation facility and unit.

PG&E, SCE and SDG&E shall disclose the information listed above in their Quarterly Procurement Plan Compliance Reports established by D.02-10-062. All other LSEs shall disclose this information in the annual Attestation Letter required under Ordering Paragraph 4.

- C. **The PD Should Be Revised to Provide That Penalties Shall Only Be Imposed for Knowing or Willful Violations of the EPS and Reporting Requirements.**

AReM is concerned that the PD does not place any parameters on non-compliance penalties. AReM does not disagree that it may be appropriate to impose penalties on LSEs in some circumstances, such as where an LSE fails to report covered procurement or makes misrepresentations in their EPS compliance filing. Under the PD, however, penalties could be imposed for even minor or unintentional infractions of the EPS rules. AReM believes that penalties would be inappropriate in such circumstances, particularly given that the EPS and related reporting requirements constitute an entirely new form of regulation for LSEs.

Accordingly, AReM recommends that the PD be revised to clarify that LSEs should be subject to potential penalties only for knowing or willful violations of the EPS rules.

III. CONCLUSION

For the foregoing reasons, AReM urges the Commission to adopt the PD with the minor modifications recommended herein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document on all parties of record in the above captioned proceedings by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on January 2, 2007, at Woodland Hills, California.



Michelle Dangott

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